IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

CRISTIAN ARIEL AREVALO ARIAS,

Defendant.

No. 1:21-CR-260

Hon. Leonie M. Brinkema

Trial Date: September 11, 2023

Motions Hearing Date: May 23, 2023

GOVERNMENT'S RESPONSE TO MOTION TO COMPEL DISCLOSURE OF JAILHOUSE INFORMANT COOPERATION, INFORMATION, AND TESTIMONY

Defendant Cristian Ariel Arevalo Arias ("Arevalo") has moved this Court to order the United States to disclose the identities of individuals incarcerated with Arevalo whom the government intends to call as witnesses at trial, together with the substance of information they have provided and information pertaining to any discussions of benefits that might potentially or actually be conferred on those individuals in exchange for their information. ECF 208. In other words, Arevalo seeks to learn the identities, anticipated testimony, and *Giglio* information of "jailhouse informants," i.e., individuals arrested and jailed for unrelated crimes who purport to have gleaned information about him while they were in custody together.

Neither the government nor the Court need address the merits of Arevalo's motion because it is moot. While the United States intends to call certain individuals who were arrested and prosecuted in connection with the investigation that gave rise to Arevalo's arrest and indictment as witnesses at trial, the government does not intend to call any jailhouse informant to testify

¹ Defendants Jairo Gustavo Aguilera Sagastizado, Melvin Canales Saldana, and Marvin Menjivar Gutiérrez have moved to adopt Arevalo's motion. ECF Nos. 232, 233, and 249.

against Arevalo or any other defendant named in the Superseding Indictment. Accordingly, the United States respectfully requests that this Court enter an Order denying Arevalo's motion.

Respectfully submitted,

Jessica D. Aber United States Attorney

By: ______

John C. Blanchard Maureen C. Cain Megan C. Braun

Assistant United States Attorneys

Matthew K. Hoff
Department of Justice Trial Attorney
Organized Crime and Gang Section

CERTIFICATE OF SERVICE

I certify that on May 5, 2023, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will cause a true and accurate copy of this document to be transmitted to counsel of record.

By: _____/s/

John C. Blanchard Assistant United States Attorney Office of the United States Attorney 2100 Jamieson Avenue Alexandria, Virginia 22314

Phone: (703) 299-3999 Fax: (703) 299-3980

John.Blanchard@usdoj.gov